

WILMERHALE

February 19, 2021

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The Honorable Lorna G. Schofield
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Harrington Global Opportunity Fund, Limited v. CIBC World Markets Corp. et al.*,
No. 1:21-cv-00761 (LGS)

Dear Judge Schofield:

I represent defendants TD Securities, Inc., and TD Securities (USA) LLC in the above-captioned action. I write on behalf of all parties, pursuant to Rule I.B.2 of the Court's Individual Rules of Practice, to request an adjournment of all defendants' deadlines to answer, move, or otherwise respond to the Complaint.

Plaintiff has filed affidavits of service indicating that it effected service of the Complaint upon certain defendants, including CIBC World Markets Corp., Merrill Lynch Professional Clearing Corp., TD Securities (USA) LLC, SG Americas Securities, LLC, and UBS Financial Services, Inc., on February 1, 2021, such that those defendants' deadline to answer, move, or otherwise respond to the Complaint is February 22, 2021. *See* ECF Nos. 8-12. Other defendants appear to have been served subsequently and have later deadlines to respond, and still other defendants have yet to be served.

In the interest of efficiency and judicial economy, and to permit the parties to meet and confer regarding a unified schedule under which all defendants will answer, move, or otherwise respond to the Complaint, the parties jointly request that all defendants' current deadlines to answer or otherwise respond to the Complaint be adjourned *sine die*, and the parties be ordered to submit to the Court a joint proposal concerning the schedule for defendants' contemplated motions to dismiss as part of the joint letter due one week before the status conference the Court has calendared for April 8, 2021. *See* ECF No. 14. This is the first request for adjournment or extension of time by either party.

In making this request defendants do not intend to waive any defenses available to them in the case, including without limitation on grounds of lack of personal jurisdiction.

We thank the Court for considering this request.

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Respectfully submitted,

By: /s/ David Lesser
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